IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re: **DONNA J. COHEN** *and* **NEAL SCULLY,** *Debtors.*	Bankruptcy No. 09-3-4515 JFS Chapter 11 **AMENDMENT TO DEBTORS' AMENDED CHAPTER 11 PLAN DATED JANUARY 16, 2012**

DONNA J. COHEN and **NEAL SCULLY,** Debtors in Possession, through the undersigned counsel, hereby submit these amendments to their Chapter 11 Plan dated January 16, 2012:

Section IV is amended by striking the existing paragraph dealing with the Class B-3 creditors and substituting therefor the following language:

Class B-3 (impaired claim). The pre-petition arrearage claim of US Bank, N.A. (Claim No. 5), which is secured by 4607 Atlantic Avenue, Ocean City, Maryland 21843 (a/k/a 13 37th Street, Ocean City, MD 21842), in the amount of $19,291.79, shall be paid in full, without interest, in equal quarterly cash payments commencing 90 days after the Effective Date of the Plan, and continuing for five (5) years from such date, unless a different treatment is agreed to or provided for in the Plan. Post-petition payments, including escrows, if any, shall continue to be made pursuant to the terms of the original loan documents. US Bank, N.A. shall retain its lien.

Section IV is amended by striking the existing paragraph dealing with the Class C creditors and substituting therefor the following language:

C. Class C (General Unsecured Claims). C. Class C (General Unsecured Claims). Class C claims shall consist of all general unsecured claims. Holders of Class C claims shall be paid, *pro rata,* a total of $8,000.00, from the funds contributed under Section XII(C), to be paid in full on the Effective Date. Confirmation of the Plan shall serve to release any holder of a Class C claim as of the Petition Date of any claim or cause of action against such holder (other than defenses of setoff or recoupment). The *pro rata* share of the claimed amount of any claims which are then subject to objections as to which a Final Order has not been entered shall be deposited in an interest bearing bank account until a Final Order is entered. When Final Orders are entered disallowing or allowing and liquidating all Class C claims, the remaining funds in the bank account shall be distributed to the holders of all Class C claims pro rata. Payments on Class C claims shall be mailed to the address of the creditor on the proof of claim (or, if allowed pursuant to the schedules, to the address on the schedules), unless the creditor files a change of address notice with the Court. Any check mailed to the proper address and returned by the post office as undeliverable, or not deposited within 180 days, shall be void and the funds may be retained by the Debtors. This class is impaired.

Section XII is amended by adding the following new paragraph C:

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C. On the Effective Date of the Plan, the Debtors' existing equity interests in the Estate shall be cancelled. Debtors will pay the sum of $8,000.00 as new value to reacquire the equity in the Estate, which new sum will come from IRA/retirement funds listed in Schedule B which are exempt and/or not property of the Estate. A total of $10,000.00 shall be withdrawn from such funds, and that amount less the $2,000.00 tax withholding on such withdrawal (net $8,000.00) will be paid to the General Unsecured Class C Creditors.

None of these amendments reduce or change funding or distribution to any creditor, other than *increasing* funding to the General Unsecured Class C Creditors.

July 19, 2012

Respectfully submitted,

CHUNG & PRESS, LLC

By: /s/ Brett Weiss

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